

EXECUTIVE SUMMARY - ENFORCEMENT MATTER
DOCKET NO.: 2007-1325-PWS-E TCEQ ID: RN100238708 CASE NO.: 34429
RESPONDENT NAME: INEOS USA LLC

Page 1 of 2

ORDER TYPE:		
<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> FINDINGS ORDER FOLLOWING SOAH HEARING
<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> EMERGENCY ORDER	
CASE TYPE:		
<input type="checkbox"/> AIR	<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE
<input checked="" type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input type="checkbox"/> WATER QUALITY	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL
<input type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input type="checkbox"/> DRY CLEANER REGISTRATION
<p>SITE WHERE VIOLATION(S) OCCURRED: Chocolate Bayou Plant, located approximately two miles south of the intersection of Farm-to-Market Roads 2004 and 2917, Brazoria County</p> <p>TYPE OF OPERATION: Public drinking water system</p> <p>SMALL BUSINESS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>OTHER SIGNIFICANT MATTERS: There are no complaints. There are three additional pending enforcement actions regarding this facility location, Docket Nos. 2007-1279-AIR-E, 2007-1100-AIR-E, and 2007-0370-AIR-E.</p> <p>INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.</p> <p>COMMENTS RECEIVED: The <i>Texas Register</i> comment period expired on January 14, 2008. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator: None TCEQ Enforcement Coordinator: Mr. Christopher Keffer, Enforcement Division, Enforcement Team 2, MC 169, (512) 239-5610; Mr. Bryan Sinclair, Enforcement Division, MC 219, (512) 239-2171 Respondent: Mr. John Harvey III, Site Director, INEOS USA LLC, P.O. Box 1488, Alvin, Texas 77512 Respondent's Attorney: Not represented by counsel on this enforcement matter</p>		

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation: <input type="checkbox"/> Complaint <input type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input checked="" type="checkbox"/> Records Review</p> <p>Date(s) of Complaints Relating to this Case: None</p> <p>Date of Investigation Relating to this Case: July 10, 2007</p> <p>Date of NOV/NOE Relating to this Case: July 12, 2007 (NOE)</p> <p>Background Facts: This was a routine record review. One violation was documented.</p> <p>WATER</p> <p>Failed to comply with the maximum contaminant level ("MCL") of 0.080 milligrams per liter ("mg/L") for trihalomethanes ("TTHM"), based on a running annual average [30 TEX. ADMIN. CODE § 290.113(f)(4) and TEX. HEALTH & SAFETY CODE § 341.0315(c)].</p>	<p>Total Assessed: \$632</p> <p>Total Deferred: \$0 <input type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid to General Revenue: \$632</p> <p>Site Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Major Source: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Ordering Provisions:</p> <p>The Order will require the Respondent to:</p> <p>a. Within 365 days after the effective date of this Agreed Order, return to compliance with the running annual average MCL of 0.080 mg/L for TTHM; and</p> <p>b. Within 380 days after the effective date of this Agreed Order, submit written certification, including photographs, receipts, or other information to demonstrate compliance.</p>



Policy Revision 2 (September 2002)

Penalty Calculation Worksheet (PCW)

PCW Revision June 26, 2007

TCEQ

DATES	Assigned	6-Aug-2007	Screening	14-Aug-2007	EPA Due	10-Feb-2008
	PCW	14-Aug-2007				

RESPONDENT/FACILITY INFORMATION

Respondent	INEOS USA LLC		
Reg. Ent. Ref. No.	RN100238708		
Facility/Site Region	12-Houston	Major/Minor Source	Minor

CASE INFORMATION

Enf./Case ID No.	34429	No. of Violations	1
Docket No.	2007-1325-PWS-E	Order Type	1660
Media Program(s)	Public Water Supply	Enf. Coordinator	Christopher Keffer
Multi-Media		EC's Team	EnforcementTeam 2
Admin. Penalty \$	Limit Minimum	\$50	Maximum
			\$1,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)

Subtotal 1 \$250

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History 128% Enhancement Subtotals 2, 3, & 7 \$320

Notes

The penalty is enhanced due to two NOV's with violations same or similar to those cited in this action, 13 unrelated NOV's (including two monthly self reported effluent violations), and five agreed final enforcement orders containing a denial of liability and is reduced due to six notices of intent to conduct self audits and one disclosure of violations under the Self Audit Act.

Culpability

Yes

25% Enhancement

Subtotal 4 \$62

Notes

The Respondent was issued an alert letter for total trihalomethanes ("TTHM") exceedance on November 7, 2006.

Good Faith Effort to Comply

0%

Reduction

Subtotal 5 \$0

Before NOV NOV to EDPRP/Settlement Offer

Extraordinary

Ordinary

N/A

X

(mark with x)

Notes

The Respondent does not meet the good faith criteria.

0% Enhancement*

Subtotal 6 \$0

Total EB Amounts \$901

Approx. Cost of Compliance \$5,000

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7

Final Subtotal \$632

OTHER FACTORS AS JUSTICE MAY REQUIRE

0%

Adjustment \$0

Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes

Final Penalty Amount \$632

STATUTORY LIMIT ADJUSTMENT

Final Assessed Penalty \$632

DEFERRAL

Reduction

Adjustment \$0

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes

No deferral offered because culpability exists.

PAYABLE PENALTY

 \$632

Screening Date 14-Aug-2007

Docket No. 2007-1325-PWS-E

PCW

Respondent INEOS USA LLC

Policy Revision 2 (September 2002)

Case ID No. 34429

PCW Revision June 26, 2007

Reg. Ent. Reference No. RN100238708

Media [Statute] Public Water Supply

Enf. Coordinator Christopher Keffer

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component Number of... Enter Number Here Adjust.

NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	2	10%
	Other written NOVs	13	26%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	5	100%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	6	-6%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	1	-2%

Please Enter Yes or No

Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 128%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Average Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance
History
Notes

The penalty is enhanced due to two NOVs with violations same or similar to those cited in this action, 13 unrelated NOVs (including two monthly self reported effluent violations), and five agreed final enforcement orders containing a denial of liability and is reduced due to six notices of intent to conduct self audits and one disclosure of violations under the Self Audit Act.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 128%

Screening Date 14-Aug-2007 Respondent INEOS USA LLC Case ID No. 34429 Reg. Ent. Reference No. RN100238708 Media [Statute] Public Water Supply Enf. Coordinator Christopher Keffer Violation Number <input type="text" value="1"/>	Docket No. 2007-1325-PWS-E PCW <i>Policy Revision 2 (September 2002)</i> <i>PCW Revision June 26, 2007</i>																			
Rule Cite(s) <input type="text" value="30 Tex. Admin.Code § 290.113(f)(4) and Tex. Health & Safety Code § 341.0315(c)"/>																				
Violation Description <input ("mg="" ("tthm"),="" 0.080="" 0.098="" 0.149="" 2006="" 2007."="" a="" and="" annual="" average="" average.="" based="" concentrations="" first="" for="" fourth="" l="" l")="" liter="" mcl")="" mg="" milligrams="" of="" on="" per="" quarter="" running="" specifically,="" the="" trihalomethanes="" tthm="" type="text" value="Failed to comply with the maximum contaminant level (" were=""/>																				
Base Penalty <input type="text" value="\$1,000"/>																				
>> Environmental, Property and Human Health Matrix																				
OR	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th colspan="3" style="text-align: center;">Harm</th> <th></th> </tr> <tr> <th></th> <th style="text-align: center;">Major</th> <th style="text-align: center;">Moderate</th> <th style="text-align: center;">Minor</th> <th></th> </tr> </thead> <tbody> <tr> <td>Release Actual</td> <td><input type="text"/></td> <td style="text-align: center;">x</td> <td><input type="text"/></td> <td rowspan="2" style="vertical-align: middle;">Percent <input type="text" value="25%"/></td> </tr> <tr> <td>Potential</td> <td><input type="text"/></td> <td><input type="text"/></td> <td><input type="text"/></td> </tr> </tbody> </table>		Harm					Major	Moderate	Minor		Release Actual	<input type="text"/>	x	<input type="text"/>	Percent <input type="text" value="25%"/>	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>
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	Major	Moderate	Minor																	
Falsification	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text" value="0%"/>																
Matrix Notes	<input type="text" value="Exceeding the MCL for TTHM exposes customers of the water supply to significant amounts of contaminants that do not exceed levels that are protective of human health."/>																			
Adjustment <input type="text" value="\$750"/>																				
<input type="text" value="\$250"/>																				
Violation Events																				
<table style="width: 100%;"> <tr> <td style="width: 40%;">Number of Violation Events <input type="text" value="1"/></td> <td style="width: 20%; text-align: center;"><input type="text" value="181"/></td> <td style="width: 40%;">Number of violation days</td> </tr> </table>		Number of Violation Events <input type="text" value="1"/>	<input type="text" value="181"/>	Number of violation days																
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quarterly	<input type="text"/>																			
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annual	x																			
single event	<input type="text"/>																			
Violation Base Penalty <input type="text" value="\$250"/>																				
<input type="text" value="One annual event is recommended."/>																				
Economic Benefit (EB) for this violation																				
Statutory Limit Test																				
Estimated EB Amount	<input type="text" value="\$901"/>																			
Violation Final Penalty Total <input type="text" value="\$632"/>																				
This violation Final Assessed Penalty (adjusted for limits) <input type="text" value="\$632"/>																				

Economic Benefit Worksheet

Respondent INEOS USA LLC
Case ID No. 34429
Reg. Ent. Reference No. RN100238708
Media Public Water Supply
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

Delayed Costs

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)	\$5,000	1-Oct-2006	28-Apr-2009	2.6	\$43	\$858	\$901
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs

The delayed costs include the amount to implement an alternative method of disinfection, calculated from the date when the first exceedance occurred to the estimated date of compliance.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$5,000

TOTAL

\$901

Compliance History

Customer/Respondent/Owner-Operator:	CN602817884	INEOS USA LLC	Classification: AVERAGE	Rating: 2.11
Regulated Entity:	RN100238708	CHOCOLATE BAYOU PLANT	Classification: AVERAGE	Site Rating: 1.36
ID Number(s):				
	AIR OPERATING PERMITS	ACCOUNT NUMBER	BL0002S	
	AIR OPERATING PERMITS	PERMIT	1353	
	AIR OPERATING PERMITS	PERMIT	2327	
	WASTEWATER	PERMIT	WQ0001333000	
	WASTEWATER	PERMIT	TPDES0004821	
	WASTEWATER	PERMIT	TX0004821	
	PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	12999	
	PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	0200132	
	UNDERGROUND INJECTION CONTROL	PERMIT	5D0400007	
	AIR NEW SOURCE PERMITS	PERMIT	53419	
	AIR NEW SOURCE PERMITS	PERMIT	95	
	AIR NEW SOURCE PERMITS	PERMIT	101	
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	BL0002S	
	AIR NEW SOURCE PERMITS	AFS NUM	4803900014	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX854	
	AIR NEW SOURCE PERMITS	PERMIT	488A	
	AIR NEW SOURCE PERMITS	PERMIT	489	
	AIR NEW SOURCE PERMITS	PERMIT	491A	
	AIR NEW SOURCE PERMITS	PERMIT	1041	
	AIR NEW SOURCE PERMITS	PERMIT	1611	
	AIR NEW SOURCE PERMITS	PERMIT	2798	
	AIR NEW SOURCE PERMITS	PERMIT	2866C	
	AIR NEW SOURCE PERMITS	PERMIT	4882	
	AIR NEW SOURCE PERMITS	PERMIT	5419	
	AIR NEW SOURCE PERMITS	PERMIT	7196	
	AIR NEW SOURCE PERMITS	PERMIT	9517	
	AIR NEW SOURCE PERMITS	PERMIT	19868	
	AIR NEW SOURCE PERMITS	PERMIT	35735	
	AIR NEW SOURCE PERMITS	PERMIT	46192	
	AIR NEW SOURCE PERMITS	PERMIT	48637	
	AIR NEW SOURCE PERMITS	REGISTRATION	75608	
	AIR NEW SOURCE PERMITS	REGISTRATION	12953	
	AIR NEW SOURCE PERMITS	REGISTRATION	53419	
	AIR NEW SOURCE PERMITS	REGISTRATION	75399	
	AIR NEW SOURCE PERMITS	REGISTRATION	10465	
	AIR NEW SOURCE PERMITS	REGISTRATION	10906	
	AIR NEW SOURCE PERMITS	REGISTRATION	11060	
	AIR NEW SOURCE PERMITS	REGISTRATION	11539	
	AIR NEW SOURCE PERMITS	REGISTRATION	12136	
	AIR NEW SOURCE PERMITS	REGISTRATION	12709	
	AIR NEW SOURCE PERMITS	REGISTRATION	71820	
	AIR NEW SOURCE PERMITS	PERMIT	P983	
	AIR NEW SOURCE PERMITS	REGISTRATION	74968	
	AIR NEW SOURCE PERMITS	REGISTRATION	76394	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX793	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX983	
	AIR NEW SOURCE PERMITS	REGISTRATION	76826	
	AIR NEW SOURCE PERMITS	REGISTRATION	76401	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX642	
	AIR NEW SOURCE PERMITS	REGISTRATION	78501	
	AIR NEW SOURCE PERMITS	REGISTRATION	78483	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX854M2	
	WATER LICENSING	LICENSE	0200132	
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD050309012	
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	30042	
	INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50121	
	INDUSTRIAL AND HAZARDOUS WASTE STORAGE	EPA ID	TXD050309012	
	INDUSTRIAL AND HAZARDOUS WASTE	PERMIT	50121	

STORAGE		
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION #	30042
	(SWR)	
INDUSTRIAL AND HAZARDOUS WASTE COMPLIANCE PLANS	PERMIT	50121
INDUSTRIAL AND HAZARDOUS WASTE POST CLOSURE	PERMIT	50121
Location: approximately two miles south of the intersection of Farm-To-Market Roads 2004 and 2917, in Brazoria County, Texas		Rating Date: 9/1/2006 Repeat Violator: NO

TCEQ Region:	REGION 12 - HOUSTON
Date Compliance History Prepared:	August 30, 2007
Agency Decision Requiring Compliance History:	Enforcement
Compliance Period:	August 30, 2002 to August 30, 2007

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Christopher Keffer Phone: (512) 239-5610

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? INEOS USA LLC
4. If Yes, who was/were the prior owner(s)? BP Amoco Chemical Company
5. When did the change(s) in ownership occur? 04/25/2005

Components (Multimedia) for the Site :

A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A	Effective Date: 08/28/2004	ADMINORDER 2004-0036-PST-E
	Classification: Minor	
	Citation: 2D TWC Chapter 26, SubChapter A 26.346(a)	
	30 TAC Chapter 334, SubChapter A 334.8(c)(4)(A)(vii)	
	Description: Failure to ensure the timely renewal of a previously issued UST delivery certificate.	
	Classification: Minor	
	Citation: 2D TWC Chapter 26, SubChapter A 26.3467(a)	
	30 TAC Chapter 334, SubChapter A 334.8(c)(5)(A)(i)	
	Description: Failure to make available to a common carrier a valid and current TCEQ delivery certificate before accepting the delivery of a regulated substance into the UST system.	
	Effective Date: 08/30/2004	ADMINORDER 2003-1280-AIR-E
	Classification: Major	
	Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)	
	5C THC Chapter 382, SubChapter A 382.085(b)	
	Rqmt Prov: SC 1 PERMIT	
	Description: Exceeded the volatile organic carbon maximum allowable emission rate for Flare DM-1101 on March 17, 2003. (Note mistake in order should be "compound" not "carbon")	
	Effective Date: 08/28/2006	ADMINORDER 2006-0242-AIR-E
	Classification: Moderate	
	Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)	
	30 TAC Chapter 116, SubChapter G 116.715(a)	
	5C THC Chapter 382, SubChapter A 382.085(b)	
	Rqmt Prov: Air Permit #92/PSD-TX-854, S.C.#1 PA	
	Description: Failed to prevent unauthorized emissions during a April 14, 2005 emissions event.	
	Classification: Moderate	
	Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)	
	30 TAC Chapter 116, SubChapter G 116.715(a)	
	5C THC Chapter 382, SubChapter A 382.085(b)	
	Rqmt Prov: Air Permit #95/PSD-TX-854, S.C.#1 PA	
	Description: Failed to prevent unauthorized emissions during a May 29, 2005 emissions event.	
	Classification: Moderate	
	Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)	
	30 TAC Chapter 116, SubChapter G 116.715(a)	
	5C THC Chapter 382, SubChapter A 382.085(b)	
	Rqmt Prov: Air Permit #95/PSD-TX-854, S.C.#1 PA	
	Description: Failed to prevent unauthorized emissions during a July 5, 2005 emissions event.	
	Effective Date: 11/03/2006	ADMINORDER 2006-0469-AIR-E

Classification: Major

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: No. 95/PSD-TX-854, Special Condition #1 PERMIT

Description: Failure to prevent loss of instrument air resulting in unauthorized emissions.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: Permit No. 95/PSD-TX-854 PERMIT

Description: Failed to maintain an emission rate below the maximum allowable emission limit of zero from the No. 1 Olefins Flare on November 19, 2005 [emission point No. ("EPN") DM-1101] on November 19, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: Special Condition No. 1 PERMIT

Description: Failed to maintain an emission rate below the maximum allowable emission limit of zero from the No. 1 Olefins Flare on December 11, 2005 [EPN DM-1101] on December 11, 2005.

Effective Date: 04/26/2007

ADMINORDER 2006-1893-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: No. 95, Special Condition 1 PERMIT

Description: Failed to prevent unauthorized emissions.

B. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	09/19/2002	(5424)
	2	09/23/2002	(157617)
	3	10/21/2002	(157620)
	4	11/18/2002	(13920)
	5	11/25/2002	(157624)
	6	11/25/2002	(17129)
	7	12/23/2002	(14911)
	8	12/27/2002	(157628)
	9	01/03/2003	(16037)
	10	01/09/2003	(13376)
	11	01/24/2003	(19428)
	12	01/24/2003	(157632)
	13	02/07/2003	(22862)
	14	02/18/2003	(23956)
	15	02/19/2003	(23138)
	16	02/20/2003	(157591)
	17	03/11/2003	(26612)
	18	03/11/2003	(21022)
	19	03/12/2003	(25569)
	20	03/22/2003	(295171)
	21	03/24/2003	(157594)
	22	03/28/2003	(27751)
	23	03/28/2003	(23681)
	24	04/14/2003	(31828)
	25	04/17/2003	(157599)
	26	04/25/2003	(33704)
	27	05/12/2003	(28018)
	28	05/12/2003	(28024)
	29	05/22/2003	(157603)
	30	06/11/2003	(17426)
	31	06/19/2003	(40960)
	32	06/24/2003	(157607)
	33	06/29/2003	(34948)
	34	07/10/2003	(45940)

35	07/10/2003	(45285)
36	07/10/2003	(43553)
37	07/21/2003	(157611)
38	07/30/2003	(114223)
39	08/04/2003	(144302)
40	08/19/2003	(295179)
41	08/28/2003	(152166)
42	09/15/2003	(295181)
43	09/17/2003	(248915)
44	09/17/2003	(248837)
45	09/22/2003	(150004)
46	10/17/2003	(248985)
47	10/20/2003	(295183)
48	11/14/2003	(295186)
49	11/14/2003	(252631)
50	11/18/2003	(255236)
51	11/20/2003	(255571)
52	11/21/2003	(295184)
53	12/15/2003	(295185)
54	01/12/2004	(253433)
55	01/28/2004	(257699)
56	02/13/2004	(295169)
57	04/22/2004	(295172)
58	05/12/2004	(295174)
59	05/21/2004	(60492)
60	06/15/2004	(272258)
61	06/17/2004	(295176)
62	06/28/2004	(272032)
63	07/05/2004	(278334)
64	07/05/2004	(272798)
65	07/05/2004	(278078)
66	07/05/2004	(272521)
67	07/09/2004	(272455)
68	07/13/2004	(274532)
69	07/15/2004	(351989)
70	07/19/2004	(274762)
71	08/05/2004	(287465)
72	08/16/2004	(351990)
73	08/18/2004	(284687)
74	08/30/2004	(250202)
75	08/31/2004	(277083)
76	08/31/2004	(272440)
77	09/13/2004	(293314)
78	09/23/2004	(351991)
79	10/04/2004	(336250)
80	10/22/2004	(351992)
81	11/08/2004	(336528)
82	11/08/2004	(337000)
83	11/23/2004	(351993)
84	12/11/2004	(335356)
85	12/11/2004	(341906)
86	12/11/2004	(335371)
87	12/13/2004	(338522)
88	12/13/2004	(336245)
89	12/13/2004	(333505)
90	12/13/2004	(337068)
91	12/15/2004	(337091)
92	12/16/2004	(341903)
93	12/17/2004	(337094)
94	12/20/2004	(342723)
95	12/22/2004	(381804)
96	12/28/2004	(288451)
97	12/28/2004	(287065)
98	12/28/2004	(277182)
99	01/05/2005	(287246)
100	01/06/2005	(337406)
101	01/07/2005	(341099)
102	01/07/2005	(343281)

103	01/07/2005	(288575)
104	01/07/2005	(287050)
105	01/10/2005	(286887)
106	01/17/2005	(286916)
107	01/20/2005	(381805)
108	02/04/2005	(338314)
109	02/22/2005	(381802)
110	03/21/2005	(381803)
111	04/22/2005	(419633)
112	04/26/2005	(372080)
113	05/18/2005	(374942)
114	05/19/2005	(419634)
115	05/20/2005	(392949)
116	06/20/2005	(419635)
117	07/13/2005	(440766)
118	07/15/2005	(399321)
119	08/10/2005	(404141)
120	08/13/2005	(404828)
121	08/18/2005	(404361)
122	08/19/2005	(440767)
123	08/24/2005	(404609)
124	08/24/2005	(406770)
125	08/29/2005	(407005)
126	08/30/2005	(418277)
127	09/08/2005	(337658)
128	09/08/2005	(375408)
129	09/08/2005	(372077)
130	09/16/2005	(440768)
131	09/21/2005	(431548)
132	10/10/2005	(432962)
133	10/13/2005	(440769)
134	10/13/2005	(440770)
135	11/03/2005	(431679)
136	11/18/2005	(468323)
137	12/05/2005	(397651)
138	12/20/2005	(468322)
139	12/20/2005	(468324)
140	01/12/2006	(451532)
141	01/12/2006	(451560)
142	01/26/2006	(437342)
143	01/26/2006	(438227)
144	01/26/2006	(437271)
145	01/27/2006	(451469)
146	02/15/2006	(468321)
147	02/16/2006	(436530)
148	02/24/2006	(450737)
149	02/24/2006	(450766)
150	02/24/2006	(438700)
151	02/24/2006	(450771)
152	02/24/2006	(454384)
153	02/27/2006	(449481)
154	02/27/2006	(450755)
155	02/27/2006	(440360)
156	02/28/2006	(437776)
157	02/28/2006	(333721)
158	02/28/2006	(435662)
159	02/28/2006	(450758)
160	03/17/2006	(498116)
161	03/20/2006	(454984)
162	03/20/2006	(438702)
163	03/20/2006	(454973)
164	04/19/2006	(449649)
165	04/21/2006	(498117)
166	04/24/2006	(460197)
167	04/24/2006	(460166)
168	04/24/2006	(459777)
169	04/28/2006	(453217)
170	05/04/2006	(462911)

171	05/09/2006	(453215)
172	05/10/2006	(451219)
173	05/15/2006	(454640)
174	05/16/2006	(498118)
175	05/17/2006	(462063)
176	05/19/2006	(453213)
177	06/19/2006	(498119)
178	06/30/2006	(482249)
179	07/06/2006	(485562)
180	07/07/2006	(483977)
181	07/07/2006	(484327)
182	07/07/2006	(483768)
183	07/17/2006	(498120)
184	07/21/2006	(484894)
185	07/21/2006	(485159)
186	07/27/2006	(465816)
187	08/09/2006	(375409)
188	08/16/2006	(520130)
189	09/01/2006	(489158)
190	09/01/2006	(488482)
191	09/01/2006	(488416)
192	09/01/2006	(488185)
193	09/01/2006	(488461)
194	09/01/2006	(488316)
195	09/01/2006	(488258)
196	09/01/2006	(497259)
197	09/01/2006	(488259)
198	10/10/2006	(514525)
199	10/10/2006	(511470)
200	10/12/2006	(520131)
201	10/17/2006	(515418)
202	11/08/2006	(544398)
203	11/17/2006	(544397)
204	11/27/2006	(455008)
205	12/06/2006	(518260)
206	12/12/2006	(544399)
207	12/19/2006	(532142)
208	01/12/2007	(544400)
209	01/16/2007	(534803)
210	01/17/2007	(567358)
211	02/07/2007	(544396)
212	02/22/2007	(437530)
213	02/23/2007	(437902)
214	02/26/2007	(489773)
215	02/26/2007	(541487)
216	02/28/2007	(541747)
217	03/13/2007	(455785)
218	03/22/2007	(541397)
219	03/23/2007	(460443)
220	04/03/2007	(461307)
221	04/09/2007	(541411)
222	04/11/2007	(461770)
223	04/13/2007	(532653)
224	05/03/2007	(554914)
225	05/10/2007	(555702)
226	05/18/2007	(568214)
227	05/21/2007	(511619)
228	05/25/2007	(560317)
229	06/06/2007	(562013)
230	06/25/2007	(564693)
231	07/11/2007	(454997)
232	07/19/2007	(567658)
233	07/23/2007	(567132)
234	07/23/2007	(566724)
235	07/30/2007	(568409)
236	08/10/2007	(562140)
237	08/10/2007	(563070)

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date:	09/23/2002	(5424)		
Self Report?	NO		Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) TEXAS HEALTH AND SAFETY CODE 382.085			
Description:	Violation of Tex. Admin. Code 116.115(c) which requires the holders of the permit to comply with all conditions of the permit.			
Date:	10/31/2002	(157624)		
Self Report?	YES		Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]			
Description:	Failure to meet the limit for one or more permit parameter			
Date:	03/31/2003	(23681)		
Self Report?	NO		Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.222(c)(1) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) 30 TAC Chapter 116, SubChapter B 116.115(c)			
Description:	The maintenance event and resulting unauthorized emissions were the result of human error during previous periodic maintenance. The ME emissions could have been prevented by proper planning.			
Date:	08/12/2003	(114223)		
Self Report?	NO		Classification:	Moderate
Citation:	5C THC Chapter 382, SubChapter A 382.085(a)			
Description:	Avoidable emissions event			
Date:	09/22/2003	(150004)		
Self Report?	NO		Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.222(b)(3)			
Description:	Failed to maintain flame at all times on flare GM-1401.			
Date:	08/30/2004	(250202)		
Self Report?	NO		Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)			
Rqmt Prov:	PA 35735			
Description:	Failure to comply with Special Condition No. 11A of TCEQ Permit No. 35735.			
Date:	12/28/2004	(288451)		
Self Report?	NO		Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(a)			
Rqmt Prov:	PA 5419, SC 1			
Description:	Failure to meet demonstration criteria.			
Date:	01/05/2005	(287246)		
Self Report?	NO		Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b) 5C THC Chapter 382, SubChapter A 382.085(b)			
Rqmt Prov:	PA 95, Special Condition No. 1			
Description:	Exceeded permit limit during an avoidable emissions event.			
Date:	06/13/2005	(418277)		
Self Report?	NO		Classification:	Minor
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)			
Rqmt Prov:	PERMIT Other Requirements, No. 3			
Description:	Failure to comply with chlorine residual limits for the discharge from the domestic sewage facility.			
Self Report?	NO		Classification:	Minor
Citation:	30 TAC Chapter 319, SubChapter A 319.11(b)			
Description:	Failure to analyze chlorine residual samples within hold time.			
Date:	07/15/2005	(399321)		
Self Report?	NO		Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)			
Rqmt Prov:	PA 19868 SC No. 7E			
Description:	Failure to plug the open-ended lines.			
Self Report?	NO		Classification:	Minor
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 116, SubChapter B 116.115(c) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)			
Rqmt Prov:	PA 35735 SC No. 3			
Description:	Failure to maintain net heating value of flare header to a minimum value of 300 Btu/Scf.			

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.206(i)
Description: Failure to comply with 30 TAC 117.206(i) by operating the emergency generator between the hours of 6:00 AM and Noon.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.136(b)
Description: Failure to include PP-1 powder baghouse and vent CM-1307 in the title V permit within 60 days upon discovery.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.782(c)(2)(A)
Description: Failure to conduct extraordinary attempts to repair leaking valves within seven days.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)
Rqmt Prov: PA 5419 SC No. 3
Description: Failure to avoid visible emissions from flare for more than five minutes in any two hour period.
Date: 08/31/2005 (440768)

Self Report? YES Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)[G]
Description: Failure to meet the limit for one or more permit parameter
Date: 12/05/2005 (397651)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter H 115.783(5)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
Rqmt Prov: PERMIT Permit # 95 Special Condition 28E
Description: Failure to seal three open ended lines.
Date: 04/28/2006 (453217)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT Permit No. 19868, Special Condition 1
Description: Failure to keep the emissions within the Maximum Allowable Emissions Rate Table limits specified in TCEQ Air Permit No. 19868 for the Flare.
Date: 01/17/2007 (567358)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)
5A THC Chapter 341, SubChapter A 341.0315(c)
Description: Violated the maximum contaminant level for Trihalomethanes during the fourth quarter of 2006.
Date: 05/18/2007 (568214)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.113(f)(4)
5A THC Chapter 341, SubChapter A 341.0315(c)
Description: Violated the maximum contaminant level for Trihalomethanes during the first quarter of 2007.

F. Environmental audits.

Notice of Intent Date: 07/15/2002 (32992)
Disclosure Date: 01/24/2003
Viol. Classification: Moderate
Citation: 30 TAC Chapter 331, SubChapter A
Description: Failure to submit an inventory of wells authorized by rule.

Notice of Intent Date: 11/06/2002 (29712)
No DOV Associated

Notice of Intent Date: 02/12/2004 (263978)
No DOV Associated

Notice of Intent Date: 02/12/2004 (263986)
No DOV Associated

Notice of Intent Date: 02/19/2004 (265125)
No DOV Associated

Notice of Intent Date: 09/08/2005 (435727)
No DOV Associated

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
INEOS USA LLC
RN100238708**

**§ BEFORE THE
§
§ TEXAS COMMISSION ON
§
§ ENVIRONMENTAL QUALITY**

AGREED ORDER DOCKET NO. 2007-1325-PWS-E

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding INEOS USA LLC ("INEOS") under the authority of TEX. HEALTH & SAFETY CODE ch. 341. The Executive Director of the TCEQ, through the Enforcement Division, and INEOS appear before the Commission and together stipulate that:

1. INEOS owns and operates a chemical, manufacturing plant with a public drinking water supply located approximately two miles south of the intersection of Farm-To-Market Roads 2004 and 2917, in Brazoria County, Texas (the "Facility") that has approximately 50 service connections and serves at least 25 people per day for at least 60 days per year.
2. The Commission and INEOS agree that the Commission has jurisdiction to enter this Agreed Order, and that INEOS is subject to the Commission's jurisdiction.
3. INEOS received notice of the violations alleged in Section II ("Allegations") on or about July 17, 2007.
4. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by INEOS of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
5. An administrative penalty in the amount of Six Hundred Thirty-Two Dollars (\$632) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). INEOS has paid the Six Hundred Thirty-Two Dollar (\$632) administrative penalty.

6. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
7. The Executive Director of the TCEQ and INEOS have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
8. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that INEOS has not complied with one or more of the terms or conditions in this Agreed Order.
9. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
10. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Facility, INEOS is alleged to have failed to comply with the maximum contaminant level ("MCL") of 0.080 milligrams per liter ("mg/L") for total trihalomethanes ("TTHM"), based on a running annual average, in violation of 30 TEX. ADMIN.CODE § 290.113(f)(4) and TEX. HEALTH & SAFETY CODE § 341.0315(c), as documented during a record review conducted on July 10, 2007. Specifically, the running annual average concentrations for TTHM were 0.098 mg/L for the fourth quarter of 2006 and 0.149 mg/L for the first quarter of 2007.

III. DENIALS

INEOS generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that INEOS pay an administrative penalty as set forth in Section I, Paragraph 5 above. The payment of this administrative penalty and INEOS' compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations, which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: INEOS USA LLC, Docket No. 2007-1325-PWS-E" to:

Financial Administration Division, Revenues Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088

Austin, Texas 78711-3088

2. It is further ordered that INEOS shall undertake the following technical requirements:

- a. Within 365 days after the effective date of this Agreed Order, return to compliance with the running annual average MCL of 0.080 mg/L for TTHM, in accordance with 30 TEX. ADMIN. CODE § 290.113; and
- b. Within 380 days after the effective date of this Agreed Order, submit written certification, including photographs, receipts, or other information to demonstrate compliance with Ordering Provision as described below:

The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

DBP Compliance Coordinator
Water Supply Division/ PDWS, MC 155
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

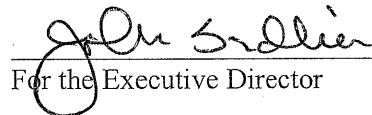
3. The provisions of this Agreed Order shall apply to and be binding upon INEOS. INEOS is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
4. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by INEOS shall be made in writing to the Executive Director. Extensions are not effective until INEOS receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.

5. This Agreed Order, issued by the Commission, shall not be admissible against INEOS in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
6. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
7. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to INEOS, or three days after the date on which the Commission mails notice of the Order to INEOS, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

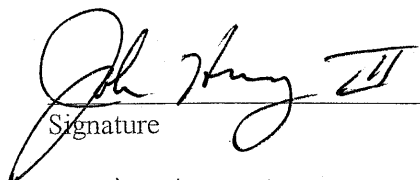
11/29/2006
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.



Signature

10/23/07
Date

John Harvey

Name (Printed or typed)
Authorized Representative of
INEOS USA LLC

Site Director

Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

2010/10/10

2010/10/10

2010/10/10

2010/10/10